

Opposition Due: May 2, 2014
Hearing Date: TBD

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
LEHMAN BROTHERS HOLDINGS INC. *et al.* : Case No. 08-13555 (SCC)
Debtors. : Jointly Administered
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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Statement of Undisputed Material Facts Pursuant to Local Bankruptcy Rule 7056-1, Declaration of Marc De Leeuw, executed March 14, 2014, and exhibits thereto, the Canary Wharf Claimants' Memorandum in Support of Their Motion for Summary Judgment on Liability, and all prior pleadings and proceedings to date, Claimants Canary Wharf Management Ltd., Heron Quays (HQ2) T1 Limited and Heron Quays (HQ2) T2 Limited will move this Court in Courtroom 621 before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the Courthouse at One Bowling Green, New York, New York, on a date and time to be determined by the Court, for summary judgment on liability with respect to proofs of claim numbers 14824 and 14826, pursuant to Rule 56 of the Federal Rules of Civil Procedure, as made applicable to this proceeding by Rules 7056 and 9014 of the Federal Rules of Bankruptcy Procedure, and Rule 7056-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE THAT in accordance with the briefing schedule agreed to by the parties and ordered by the Court on February 25, 2014, papers in opposition to the motion shall be served and filed on or before May 2, 2014, and reply papers in further support of the motion shall be served and filed on or before May 23, 2014.

Dated: New York, New York
March 14, 2014

/s/ David B. Tulchin

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